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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9
10 **Linda Hulewat; Karen Foti Williams; Ralph**
11 **Gallegos; Michael Martinez; Lynnae**
12 **Anderson; Marie Therese Montoya;**
13 **Charles Peterson; Robert Kirk; Marilyn**
14 **Zajacka; Lynda Israel; Latricia Pelt; Barry**
15 **Pelt; Ken Waters; Brenda Moreno-Decerra;**
16 **Robert Ahrens Dorf; and David Yeager;**
17 individually, and all others similarly situated,
18 Plaintiffs,

19 v.

20 **Medical Management Resource Group,**
21 **L.L.C.; Barnet Dulaney Perkins Eye Center,**
22 **PC; Marc Ellman, M.D., P.A. d/b/a**
23 **Southwest Eye Institute; Southwestern Eye**
24 **Center, Ltd.; and Eye Associates of Nevada**
25 **d/b/a SWEC Vision Institute,**
26 Defendants.

Case No. 2:24-cv-00377-DJH

**JOINT NOTICE OF
SETTLEMENT AND REQUEST
TO STAY**

Plaintiffs in the consolidated actions and Defendants Medical Management
Resource Group, L.L.C.; Barnet Dulaney Perkins Eye Center, PC; Marc Ellman, M.D.,
P.A. d/b/a Southwest Eye Institute; Southwestern Eye Center, Ltd.; and Eye Associates of
Nevada d/b/a SWEC Vision Institute, hereby notify the Court that they have reached

1 agreement on the material terms of a class settlement in this matter. To allow the Parties
 2 sufficient time to negotiate and draft a full settlement agreement, and for Plaintiffs to
 3 prepare a motion for preliminary approval of the class settlement, the Parties ask that the
 4 Court continue the stay of all case deadlines for 45 days, at which time Plaintiffs shall move
 5 for preliminary approval of the class settlement or the Parties shall provide the Court with
 6 a joint status report on settlement.

7 WHEREFORE, the Parties respectfully request that the Court stay litigation
 8 deadlines for 45 days, at which time Plaintiffs shall move for preliminary approval of the
 9 class settlement or the Parties shall provide the Court with a joint status report on
 10 settlement.

11
 12 Dated: August 28, 2025

Dated: August 28, 2025

13 /s/ Raina C. Borrelli
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CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that on August 28, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, below, via the ECF system.

DATED this 28th day of August, 2025.

STRAUSS BORRELLI PLLC

By: /s/ Raina C. Borrelli

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